

**Congress of the United States**  
**Washington, DC 20515**

197

March 28, 2019

The Honorable Ajit V. Pai, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Dear Chairman Pai,

In an effort to expand broadband adoption, we are writing to request information about the current state of enrollment in the Lifeline Program and the Lifeline National Eligibility Verifier (National Verifier).

As you know, the Lifeline Program helps low-income individuals, working parents, veterans, tribal citizens, and so many other Americans maintain a broadband connection during hard times. Studies show that the most common barrier to broadband adoption among Americans who involuntarily lack internet access is the cost of service.<sup>1</sup> This is a major cause of the digital divide. The stark reality is that Americans living in households that earn less than \$30,000 per year are more than nine times as likely to lack internet at home than better-resourced Americans.<sup>2</sup>

The Lifeline Program seeks to remedy these disparities and close the digital divide. The Federal Communications Commission (FCC) and Congress have worked hard to make the program as efficient as possible. Part of that effort involves the creation of the National Verifier to provide automated determinations about whether individuals are eligible for Lifeline.

Over the course of the past year, it has become increasingly clear that the state-by-state rollout of the National Verifier requires additional oversight. Specifically, it has come to our attention that deficiencies in the data systems used in the verification process in select states may be cutting out potentially eligible applicants from receiving service or increasing the burden on an applicant as opposed to streamlining data sources, as intended.<sup>3</sup> If accurate, these deficiencies threaten the integrity of the program the National Verifier was created to preserve.

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<sup>1</sup> Monica Anderson, Andrew Perrin, and Jingjing Jiang, "11% of Americans Don't Use the Internet. Who Are They?" (Pew Research Center, March 5, 2018), <http://www.pewresearch.org/fact-tank/2018/03/05/some-americans-dont-use-the-internet-who-are-they/>.

<sup>2</sup> *Id.*


<sup>3</sup> *See, e.g.*, "Emergency Petition of TracFone Wireless, Inc. for an Order Directing USAC to Alter the Implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes," WC Docket Nos. 17-287, 11-42, 09-197 (Aug. 9, 2018); Martha Guzman Aceves, "Ex Parte - In the Matter of... Lifeline and Link-Up Reform and Modernization," (February 19, 2019).

Given these concerns, we request that the FCC, working with the Universal Service Administration Company (USAC) and all other entities or contractors charged by the FCC or USAC to administer the Lifeline Program (Lifeline Administrators), respond to the inquiries below. We would appreciate complete responses to the following inquiries no later than April 18, 2019.

1. Please provide a list of all state databases, with associated states, that the FCC or Lifeline Administrators were unable to access or unable to integrate into the automated verification system. For state databases where Administrators were unable to integrate into the automated verification system, please provide the dates when the FCC believes those databases will be integrated.
2. For each state where the National Verifier was launched (including hard launches and soft launches) how many total households applied for Lifeline since the rollout of the National Verifier?
  - How many of the total, and what percentage of households that applied, were not automatically enrolled through the National Verifier?
  - How many of the households that were not enrolled automatically through the National Verifier were subsequently enrolled in the Lifeline Program?
  - How many of the households that were not enrolled automatically were potentially eligible under a criteria not included in the state's roll out of the National Verifier?
3. Of those households that were unable to automatically enroll in the Lifeline Program through the National Verifier process and subsequently enrolled through an alternative process, what was the average delay from first application to the National Verifier until approval?
4. For each state in which the National Verifier was launched (including hard launches and soft launches) how many, and what percentage of existing Lifeline subscribers, were required to resubmit documentation as proof of eligibility? How many were required to resubmit a new application form altogether?

We thank you in advance for your cooperation and look forward to your timely response.

Sincerely,

  
Yvette D. Clarke  
Member of Congress

  
Anna G. Eshoo  
Member of Congress



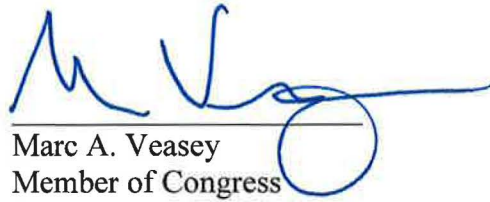
Michael F. Doyle  
Member of Congress



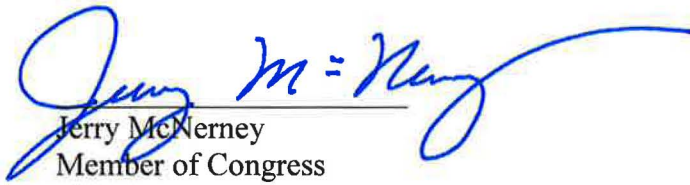
Tony Cárdenas  
Member of Congress



G. K. Butterfield  
Member of Congress



Marc A. Veasey  
Member of Congress



Jerry McNerney  
Member of Congress

cc: The Honorable Michael O'Rielly, Commissioner  
The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner  
The Honorable Geoffrey Starks, Commissioner



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

May 13, 2019

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

Thank you for your letter regarding the importance of an effective rollout of the Lifeline Program's National Eligibility Verifier. I am committed to bridging the digital divide, and, like you, believe that the Lifeline program can help do just that.

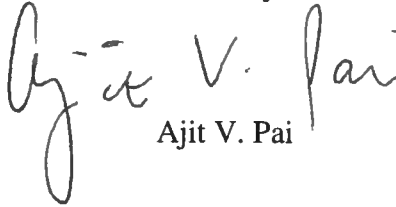
The Commission voted in 2016 to establish the National Verifier to (1) better serve eligible Lifeline beneficiaries by improving the enrollment experience and facilitating increased consumer choice; (2) provide administrative efficiencies that will lower costs to the Universal Service Fund and to Lifeline service providers; and (3) protect against and reduce waste, fraud, and abuse in the Lifeline program. I remain confident that, once fully implemented, the National Verifier will meet these goals.

To date, the Commission and the Universal Service Administrative Company (USAC) have made significant progress in rolling out the National Verifier and are working diligently to meet the December 2019 deployment timeframe established by the FCC in 2016. As of March 12, 2019, 27 states and territories are participating in the National Verifier. And currently, the National Verifier can automatically check applicants' eligibility either through the automated connection to the Federal Public Housing Assistance database or, if available, through an automated connection to a state eligibility database. If the National Verifier is unable to confirm eligibility using these databases, then eligibility is determined through the manual review process. After the National Verifier confirms an applicant's eligibility, verifies the applicant's identity, and determines that no duplicate Lifeline account is already in the system, the applicant can then select a service provider to begin receiving Lifeline benefits.

USAC and the Commission continue to work to improve the automated connections available through the National Verifier as the rollout progresses. For example, USAC and the Commission are in the process of establishing an automated connection with the Centers for Medicare and Medicaid Services. This connection would automatically verify the eligibility of Lifeline applicants who participate in Medicaid. As this connection could enable the National Verifier to automatically verify the eligibility of up to 60% of Lifeline subscribers, this will be a significant step forward in the rollout of the National Verifier. I expect this automated connection to be established later this year, and Lifeline applicants in all states and territories will be able to have their eligibility checked through this connection, regardless of whether a state automated connection has been established.

I have provided further responses to your specific questions in the attachment. I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai

Enclosure





FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 13, 2019

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
202 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

Thank you for your letter regarding the importance of an effective rollout of the Lifeline Program's National Eligibility Verifier. I am committed to bridging the digital divide, and, like you, believe that the Lifeline program can help do just that.

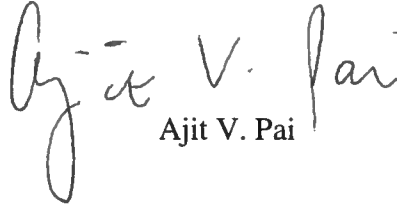
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

May 13, 2019

The Honorable Mike Doyle  
U.S. House of Representatives  
306 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter regarding the importance of an effective rollout of the Lifeline Program's National Eligibility Verifier. I am committed to bridging the digital divide, and, like you, believe that the Lifeline program can help do just that.

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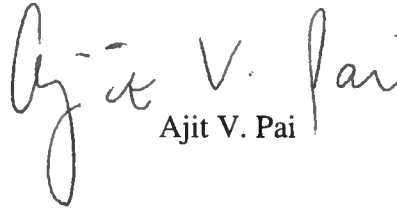
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Page 2 - The Honorable Mike Doyle

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Ajit V. Pai

Enclosure



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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

May 13, 2019

The Honorable G.K. Butterfield  
U.S. House of Representatives  
2080 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Butterfield:

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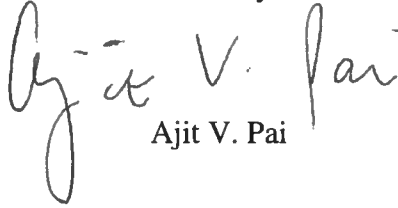
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May 13, 2019

The Honorable Tony Cárdenas  
U.S. House of Representatives  
2438 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Cárdenas:

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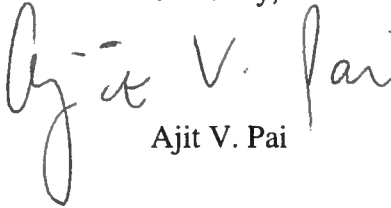
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May 13, 2019

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

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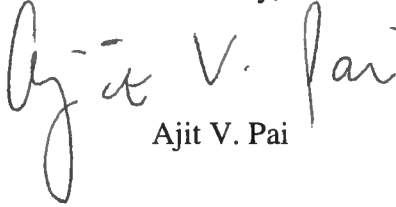
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

May 13, 2019

The Honorable Marc Veasey  
U.S. House of Representatives  
1519 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Veasey:

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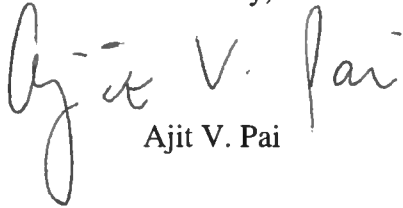
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Ajit V. Pai

Enclosure

## ATTACHMENT

1. Currently, the National Verifier has launched, but does not have access to a state database, in the following 16 states, territories, and district: Alaska, American Samoa, Delaware, the District of Columbia, Guam, Hawaii, Idaho, Maine, Montana, New Hampshire, North Dakota, the Northern Mariana Islands, Rhode Island, South Dakota, the U.S. Virgin Islands, and Wyoming. However, the National Verifier does have access to the Federal Public Housing Assistance database in these jurisdictions. It will also have access to any future federal database connections that are established, including the Centers for Medicare and Medicaid Services database. The Universal Service Administrative Company (USAC) has recently been in contact with these jurisdictions and is willing to work with any state, territory, or district interested in establishing a connection.
2. The National Verifier performs multiple checks—it confirms an applicant’s identity and address information, checks for duplicate applications or existing subscribership, and verifies the applicant’s eligibility for the Lifeline program. It does not automatically enroll applicants in the Lifeline Program. After identity, non-duplication, and eligibility have been confirmed, Lifeline applicants can then select a Lifeline service provider to begin receiving Lifeline benefits.

The National Verifier rollout process has two parts—an initial, or soft, launch period and then a full, or hard, launch period. During the soft launch, Lifeline applications can be submitted either through the National Verifier or through the applicant’s service provider. After the hard launch, applicants are required to apply for Lifeline through the National Verifier. Neither the FCC nor USAC has data on the applications submitted to service providers during soft launches.

As the National Verifier does not automatically enroll consumers in the Lifeline program, applicants are not denied Lifeline benefits simply because the National Verifier does not have an automated connection with the applicant’s qualifying program. Rather, if eligibility cannot be verified using an automated connection, the National Verifier asks the applicant to submit additional documentation so that USAC may manually review the applicant’s eligibility.

**Table 1** below provides (1) the full launch date for each National Verifier state; (2) the number of applications received by the National Verifier in each state; (3) the number and percentage of applications approved by the National Verifier after conducting eligibility, identity, deceased, address, and duplicate checks; and (4) the number and percentage of applications that were approved via a manual review. Manual review is required after an application fails one or more automated checks of the applicant’s eligibility, identity, address, status as deceased or alive, or status as a non-duplicative Lifeline account. Table 1 captures data through March 31, 2019.

**Table 1. Applications Approved Through the National Verifier**

State	Launch Date	Applications Submitted	Applications Approved	Approval Rate	Applications Approved After Manual Review	Approval Rate for Manual Review
AK	5/7/2019	77	17	22%	17	22%
AS	5/7/2019	3	0	0%	0	0%
CO	11/2/2018	10,927	7,874	72%	668	18%
DC	5/7/2019	3	0	0%	0	0%
DE	5/7/2019	22	4	18%	3	14%
GU	1/15/2019	133	77	58%	62	53%
HI	1/15/2019	1,622	423	26%	340	22%
ID	1/15/2019	2,034	529	26%	472	24%
ME	5/7/2019	17	4	24%	3	19%
MO	3/5/2019	2,943	1,904	65%	130	11%
MP	5/7/2019	6	1	17%	1	17%
MS	11/2/2018	20,735	10,379	50%	2,215	18%
MT	11/2/2018	1,323	541	41%	522	40%
NC	3/5/2019	7,064	4,162	59%	434	13%
ND	1/15/2019	891	376	42%	321	38%
NH	1/15/2019	1,496	528	35%	438	31%
NM	11/2/2018	21,227	15,442	73%	2,420	29%
PA	3/5/2019	8,275	5,021	61%	862	21%
RI	5/7/2019	27	10	37%	10	37%
SD	1/15/2019	885	427	48%	381	45%
TN	3/5/2019	5,907	3,347	57%	338	12%
UT	11/2/2018	7,596	4,343	57%	1,050	24%
VI	5/7/2019	2	0	0%	0	0%
WY	11/2/2018	169	43	25%	38	23%
<b>Total</b>	-	<b>93,384</b>	<b>55,452</b>	<b>59%</b>	<b>10,725</b>	<b>22%</b>

- As explained above, the National Verifier does not automatically enroll consumers in the Lifeline program. If eligibility cannot be verified using an automated connection, the National Verifier asks the applicant to submit additional documentation so that USAC may manually review the applicant's eligibility. Applicants have 45 days to submit the required documents either through the mail or through the online portal. Once the supporting documents are submitted, USAC manually reviews the documents and determines eligibility. For applications that are ultimately deemed qualified, the manual review process takes an average of 8 days from the date the consumer begins the application, including time taken by the consumer to complete the application.

The National Verifier has two types of manual reviews: non-real-time and real-time reviews. Real-time manual review of documentation occurs for documents submitted during regular service center operating hours through one of the National Verifier's online portals. USAC completes these manual reviews, on average, in about 6 minutes. The response is immediately provided via the online portal.

Non-real-time review of documentation occurs for mailed-in documents and for documents submitted on one of the National Verifier portals (the service provider portal or the consumer portal) outside service center operating hours. USAC normally reviews these within two business days, and USAC confirmed that it has consistently met this timeframe. After the documents are reviewed, USAC contacts the consumer, either by U.S. Postal Service or through an online portal, within two days.

4. Part of the National Verifier launch process is reverification—that is, the National Verifier confirms that an existing Lifeline subscriber is still eligible for the Lifeline program before finalizing the record in the National Verifier's system. This one-time process begins with the National Verifier attempting to verify each subscriber's eligibility via any available databases. If a subscriber cannot be verified through an eligibility database, the National Verifier requests and reviews any recent eligibility documentation from the service provider. If a subscriber cannot be verified using a database and the service provider does not have acceptable recent eligibility documentation on file, the National Verifier then contacts the subscriber directly to request documentation demonstrating eligibility.

After reviewing the reverification results from the first six states where the National Verifier was launched, USAC has modified the reverification process and its timeline to ensure that subscribers are given ample opportunity to submit eligibility documentation. USAC determined that not all carriers are fulfilling their obligation to reach out to their subscribers to request necessary eligibility documentation during the reverification process.

Accordingly, USAC has taken steps to conduct this outreach itself to ensure the subscriber is aware of the reverification process and has an opportunity to demonstrate their current eligibility for the Lifeline program.

**Table 2** below provides (1) the number of subscribers in each state that are undergoing reverification and (2) the number and percentage of subscribers who failed the automated eligibility check and for whom the service provider did not have recent eligibility documentation on file (i.e., the subscribers required to submit proof of program eligibility and a new certification to be reverified). Table 2 captures data through March 31, 2019. This data only includes existing subscribers in the 16 states in which the National Verifier had fully launched. Reverification has not yet begun in the following states and territories enrolled in the National Verifier: Alaska, American Samoa, the District of Columbia, Delaware, Indiana, Kentucky, Maine, Michigan, the Northern Mariana Islands, Rhode Island, and the U.S. Virgin Islands.

**Table 2. Reverification of Existing Lifeline Subscribers as of March 2019**

<b>State</b>	<b>Subscribers Being Reverified</b>	<b>Subscribers Required to Submit Documentation</b>	<b>% Subscribers Required to Submit Documentation</b>
CO	60,285	8,876	15%
GU	842	323	38%
HI	8,195	3,124	38%
ID	15,408	10,777	70%
MO	103,429	23,420	23%
MS	72,635	25,329	35%
MT	4,151	3,113	75%
NC	233,422	41,525	18%
ND	4,730	3,227	68%
NH	9,558	6,526	68%
NM	82,471	11,226	14%
PA	398,037	59,297	15%
SD	7,291	4,888	67%
TN	207,481	61,508	30%
UT	22,172	7,481	34%
WY	1,411	1,322	94%
<b>Total</b>	<b>1,231,518</b>	<b>271,962</b>	<b>22%</b>